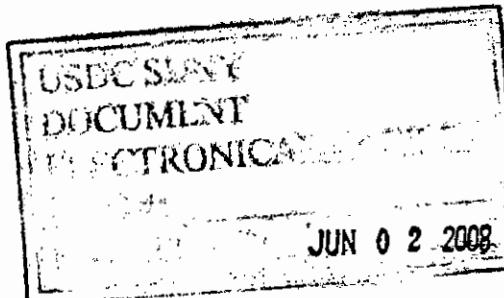




FOLEY  
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May 30, 2008

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**Via Fax: (212) 805-0426**

Honorable Laura Taylor Swain  
United States District Court  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

**MEMO ENDORSED**

Re: *E.T.I. Euro Telecom International N.V. v. Republic of Bolivia and  
Empresa Nacional de Telecomunicaciones Entel S.A.*, Civil Action No.  
08-CV-4247 (LTS/FM)

Dear Judge Swain:

On behalf of Defendant Republic of Bolivia ("Bolivia"), we respectfully request permission to submit a Memorandum of Law in Opposition to Plaintiff's Motion to Confirm the *Ex Parte* Order of Attachment issued by the Court on May 5, 2008, of up to 35 pages in length, instead of the 25-page limit provided in Your Honor's Individual Practice Rule 2(H). We have conferred with counsel for Plaintiff on whether they consent to this request, and they have authorized us to represent that they take no position on it. Counsel for Defendant Empresa Nacional de Telecomunicaciones Entel S.A. ("Entel") consents to this request.

Pursuant to a Stipulation filed with the Court on May 29, 2008, the parties have agreed that each Defendant would file its Opposition to Plaintiff's Motion to Confirm the *Ex Parte* Order of Attachment on June 3, 2008. The Stipulation is currently pending before Your Honor.

On May 5, 2008, this Court ordered the *ex parte* attachment of Entel's funds located in certain New York banks, in aid of an international arbitration filed by Plaintiff, a wholly-owned Netherlands subsidiary of an Italian telecommunications company, before the International Centre for the Settlement of Investment Disputes (ICSID) in October 2007. In Plaintiff's Request for Arbitration, it claims that Bolivia breached the Netherlands-Bolivia Bilateral Investment Treaty.

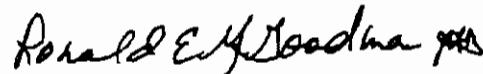
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Honorable Laura Taylor Swain  
May 30, 2008  
Page 2

Bolivia's Opposition to Plaintiff's Motion to Confirm the *Ex Parte* Order of Attachment will address several arguments related to the immunities afforded to the Defendants and the attached property pursuant to the Foreign Sovereign Immunities Act ("FSIA"), 28 U.S.C. §§ 1602, *et seq.* In addition, Bolivia will address the Convention on the Settlement of Investment Disputes between States and Nationals of Other States (the "ICSID Convention"), 17 UST. 1270, 575 UNTS 159, and the enforcement provision for awards rendered pursuant to the ICSID Convention, codified at 22 U.S.C. §1650a. Bolivia's Opposition will also address issues related to the UN Convention for the Recognition and Enforcement of Arbitral Awards (the "New York Convention").

In order to adequately address these and other issues raised by Plaintiff in its Motion to Confirm the *Ex Parte* Order of Attachment, Bolivia believes that a Memorandum in excess of 25 pages is required, particularly given the number of issues raised in this matter and their importance to the immunity of the property of a foreign state under the FSIA. Consequently, we request that the Court grant Bolivia leave to file a Memorandum of Law of up to 35 pages in Opposition to Plaintiff's Motion to Confirm the *Ex Parte* Order of Attachment.

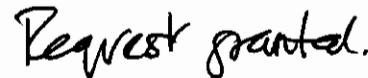
Respectfully submitted,



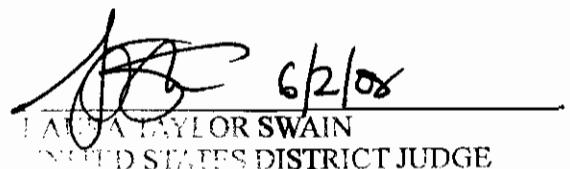
Ronald E.M. Goodman (RG 6698)

cc: Robert L. Sills  
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SO ORDERED.



Laura Taylor Swain  
UNITED STATES DISTRICT JUDGE  
6/2/08